



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

January 23, 2015

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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the  
Proposed Six-Story, 86-Unit Multi-Family Residential Building Project Located at  
3833, 3828, 3832, 3836, 3842 S. Dunn Drive in Palms (ENV-2014-2881)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

The Lead Agency proposes to demolish a surface parking lot before building a six-story, 70,930 square foot apartment building. The 86-unit building would be over one ground-level and one subterranean parking level for 77 vehicles and 95 bicycles. Approximately 9,000 cubic yards of soil export would occur from soil disturbance including excavation of the parking garage.

### Project Description

The Draft IS/MND does not include the basic information needed to understand the scope of the project's potential peak daily air quality impacts. This information should be supplied in the project description or the air quality section in the Final MND, as applicable. For example, the project start date, periods of each construction phase (including any overlapping phases), the project completion date, etc., should be included in the Final MND. An equipment list for each phase of construction should be included describing the numbers, types of equipment and hours of operation for each item. Demolition information should include the amount of debris removed, number of haul trucks, distance(s) to disposal sites, etc. Excavation information to dig the subterranean garage should include the amount of soil removed, number of haul trucks, distances to disposal sites, etc. These assumptions should be the basis of the air quality analysis used to estimate project emissions in the Final MND.

### Air Quality Analysis

In the Initial Study, the Lead agency describes potential construction and operational air quality impacts determining that these impacts would have a less than significant impact without actually estimating project emissions to demonstrate its findings. The Final MND should include an analysis of the potential project air quality impacts compared with recognized significance thresholds. If significant, mitigation should be incorporated into the Project and the Final MND to reduce impacts below level(s) of significance.

### Regional Impacts

For estimating regional and localized project impacts, the current California Emission Estimator Model (CalEEMod)<sup>1</sup> land use emissions model is available that can quantify potential project criteria pollutant and also greenhouse (GHG) emissions. Project emissions can also be estimated by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook.<sup>2</sup> Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures<sup>3</sup> in addition to the mitigation included in the Draft IS/MND starting on page 20 of the Draft IS/MND to be implemented if the air quality impacts are determined to be significant.

### Localized Impacts

Localized air quality impacts should also be evaluated since sensitive receptors (multifamily residences and residential condominiums) are located within a quarter mile of the project site, south, north and west of the project site and would potentially be adversely impacted by the construction and excavation activities occurring at the site. SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website.<sup>4</sup>

### Compliance With SCAQMD Rule 403- Fugitive Dust

Finally, the Lead Agency cites compliance with SCAQMD Rule 403 – Fugitive Dust on page 20, and generally describes measures to reduce potential construction fugitive dust emissions. Although compliance with a rule or regulation is a requirement and not mitigation in itself, the Lead Agency should incorporate the specific Rule 403 measures it intends to incorporate into the Project such as the measures described starting on page 20 (applying water, soil binders, reestablishing ground cover, etc.). Each measure and any associated, recognized control efficiency should be incorporated into both the air quality analyses and the Project in order to demonstrate that the mitigation estimates will reduce project emissions below significant levels.

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<sup>1</sup> <http://www.aqmd.gov/ceqa/models.html>

<sup>2</sup> <http://www.aqmd.gov/ceqa/hdbk.html>

<sup>3</sup> [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

<sup>4</sup> <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

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Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

*Jillian Baker*

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JB:GM

LAC150115-07  
Control Number